НО	L1295 0	06/21/20:	2 Case	23-23	3313	Doc	90-4	F	Filed 08	/28/23	3 [Entered 08/28/23	3 10:42:	14	Desc	Exhib	it	
				_					2022 P	art 4	Pά	age 1 of 27						
	Pa	rtn	er#	6 ,								Final K-3		ended	K-3			
	Sch	nedul	le K-3				Par	rtne	er's Sh	are of	f In	come, Deduction	ons,		- 1	OMB No	. 1545-(0123
	(Fo	rm 1	065)	1					Credit	s, etc	;.—	International						
	Depar	tment o	of the Treasi	irv	For	calendar :	year 2022	2, or	tax year beg	inning	12/	27/2021, ending	12/25/	<u>/20:</u>	22	20)2 2	2
			nue Service		A.1	4 41				See sep	arate	instructions.						
			2.	ormatic				ners	ship				ition Abo					
	Α	Partn	ership's e	mployer id	dentification	n numbe	r (EIN)				С	Partner's SSN or Taxpayer		Numl	per (TIN) (Do not us	e TIN c	of a
			- 79									disregarded entity. See ins	structions.)					
	В	Dowle	amalalala m				1 715											
	D	Parm	ership's n	ame, addr	ess, city,	state, and	a ZIP coa	je			D	Name, address, city, state, and Edwin M Jones			entered in (C. See instr	uctions.	
		Hol	liday	Ham H	ioldir	חתפ	T.T.C					Attn: Douglas						
			00 Por									50 Front St ST		5				
			manto		, .		381	38				Memphis		TN	38103			
															50205			
	E	Chec	ck to indic	cate the p	arts of S	Schedule	K-3 that	it api	ply.			••••••••••••••••••••••••••••••••••••••	***************************************					
				,													Yes	No
		1	Does P	art I appl	/? If "Ye	s," comp	lete and	atta	ch Part I							1		X
		2							ach Part II .							1 -	X	
		3							tach Part III								X	
		4							tach Part IV							4		X
		5							ach Part V							5		X
		6	Does P	art VI app	oly? If "Y	es," com	plete an	id att	tach Part V	T						6		X
		7	Does P	art VII ap	ply? If "\	es," cor	nplete ar	nd a	ttach Part V	/II						7		X
		8	Does P	art VIII ap	oply? If "	Yes," co	mplete a	ınd a	attach Part \	VIII						8		X
		9	Does Pa	art IX app	oly? If "Y	es," com	iplete an	id att	tach Part IX	·						9		X
		10							ach Part X							10		X
		11	Does Pa	art XI app	oly ? IT "Y	es, com	ipiete an	id att	tach Part X							11		X
		12 13	Door P	o for full	ມre use ຸ ການ ທະຫ	· · · · · · · · · · · · · · · · · · ·			ttook Dort							12		X
		13	Dues F	ait Aiii ai	ppiy : II	res, co	inpiete a	ina a	attauri Part /	<u> </u>						13		<u>A</u>
	>							10 10					y					
	ő																	
	Se																	
	For IRS Use Only																	
	프		. >															
	F.		*															

Filed 08/28/23

Doc 90-4

Case 23-23313

Entered 08/28/23 10:42:14

Desc Exhibit

JS, LLC Limitation (con	5	- Control of the Cont				5	
sales income gross income services loss	n n	600000000000000000000000000000000000000	Edwin M	Jones Oil	O .		
sales income gross income services loss.	_						
gross income services loss.		(b) Foreign branch category income	(c) Passive	Source (d) General category income	(e) Other	(f) Sourced by	(g) Total
of services al loss	1,150,104		(6	Supplied to the supplied to th	and (informal	1	1,150,104
					NAS II.		
ő : i							
: 1							
1							
מרובר	743						£7L
Research & experimental (R&E) expenses							
						And the second s	
Allocable rental expenses—							
depreciation, depletion, and amortization		1)					
Allocable rental expenses—other than							
depreciation, depletion, and amortization							
Allocable royalty and licensing							
expenses—depreciation, depletion,							
Allocable royalty and licensing							
-other than depreciation,							
depletion, and amortization							
Depreciation not included on line 33			20				
	49,078						49,078
Charitable contributions	531						531
Interest expense specifically allocable							
under Regulations section 1.861-10(e)							
Other interest expense specifically							
allocable under Regulations section							
	25,020						25,020
Other interest expense—business							-
Other interest expense—investment							
Other interest expense—passive activity							
Section 59(e)(2) expenditures,							
excluding R&E expenses on line 32							
Foreign taxes not creditable but							

CO CO		(f) Sourced by (g) Total	(category code <u>901</u>)							1,225.		-289,			(category code 901 j partner (g) Total							286	:			(1) ZP(1)
M Jones Oil		Foreign Source sive (d) General	category income											Source	(d) General category income											
Edwin M	47	Foreign (c) Passive	category income											Foreign	(c) Passive category income						32. Enter the following.					
		(b) Foreign branch	category income												(b) Foreign branch category income							85		: :	States	
continued)		(a) U.S. source								1,225,476		-289, 783	nt Factors		(a) U.S. source						R&E expenses enter	ned in the United State			ned outside the United	Control of the Contro
Holiday Ham Holdings, LLC Part II Foreign Tax Credit Limitation (continued)	Section 2—Deductions (continued)	Description	46 Sertion 086(c) loss	1 1	49 Other allocable deductions (see	50 Other apportioned share of	51 Reserved for future use	52 Reserved for future use	54 Total deductions (combine lines 25	through 53)	55 Net income (loss) (subtract line 54	Trom line 24). – 289, 783	14		Description	1 Gross receipts by SIC code A SIC code		D SIC code	E SIC code	F SIC code	2 Exclusive apportionment with respect to total R&E expenses entered on Part II, line	(i) SIC code			B R&E expense with respect to activity performed outside the United States (i) SIC code	

HOLLICARY Ham HOLCHINGS, LLC Part III Other Information for Preparation of Form 1116 or 1118 (cor Section 2—Interest Expense Apportionment Factors		LINE	Name	rtner		<i>o</i> , (SSN or TIN JEE
ction 2-Interest Expense Apportionment	of Form 1116	or 1118 (continu	ntinued)	in M Jones	Oil Co		14-15910S-
	Factors						
			Ľ.	Foreign Source			
Description (a	(a) U.S. source	(b) Foreign branch category income	category income	e (d) General	al (category code	(f) Sourced by	(g) Total
1 Total average value of assets	691,009					,	600 169
2 Sections 734(b) and 743(b) adjustment to assets—average value		The second secon					
3 Assets attracting directly allocable							
interest expense under Regulations section 1.861-10(e)							
4 Other assets attracting directly							
allocable interest expense under Reculations section 1861-10T			***************************************		4.43		
5 Assets excluded from apportionment							
			-		t-mark t		
6a Total assets used for apportionment							
(subtract the sum of lines 3, 4, and 5		り					
	690,169						600,169
b Assets attracting business interest							
c Assets attracting investment interest							
d Assets attracting passive activity							
7 Basis in deal, of 400/ surred							
(see attachment)					80 gay		
8 Basis in stock of CFCs (see attachment)							
Section 3-Foreign-Derived Intangible Income (FDII) Deduction Apportionment Factors	e (FDII) Deduc	tion Apportion	ment Factors	-			
				Foreign Source			
Description	(a) U.S. source		(b) Passive category income	(c) General category income	(alegory code)	(e) Sourced by partner	(f) Total
Foreign-derived gross receipts					(one (man)		
Cost of goods sold							
Partnership deductions allocable to foreign-	AND CONTRACTOR OF CONTRACTOR O						
derived gross receipts							
Uther partnership deductions apportioned to foreign-derived gross receipts.	·						

HOL1295 06/21/2023 3:28 SPG 23-23313 Doc 90-4 Filed 08/28/23 Entered 08/28/23 10:42:14 Desc Exhibit 2022 Part 4 Page 10 of 27 Partner# 7 Final K-3 Amended K-3 Partner's Share of Income, Deductions, Schedule K-3 OMB No. 1545-0123 Credits, etc.—International (Form 1065) For calendar year 2022, or tax year beginning 12/27/2021, ending 12/25/2022 2022 Department of the Treasury See separate instructions. Information About the Partnership Information About the Partner Partnership's employer identification number (EIN) Partner's SSN or Taxpayer Identification Number (TIN) (Do not use TIN of a disregarded entity. See instructions.) Partnership's name, address, city, state, and ZIP code Name, address, city, state, and ZIP code for partner entered in C. See instructions. Mike Wharton Holiday Ham Holdings, LLC 850 Ridge Lake Blvd 7700 Poplar Ave, Suite 200 Ste 1 Germantown TN 38138 Memphis TN 38120 Check to indicate the parts of Schedule K-3 that apply. Yes No Does Part I apply? If "Yes," complete and attach Part I X Does Part II apply? If "Yes," complete and attach Part II X 2 Does Part III apply? If "Yes," complete and attach Part III X 3 Does Part IV apply? If "Yes," complete and attach Part IV 4 X Does Part V apply? If "Yes," complete and attach Part V X 5 Does Part VI apply? If "Yes," complete and attach Part VI X 6 X 7 Does Part VII apply? If "Yes," complete and attach Part VII 7 Does Part VIII apply? If "Yes," complete and attach Part VIII X 8 Does Part IX apply? If "Yes," complete and attach Part IX X 9 9 Does Part X apply? If "Yes," complete and attach Part X X 10 Does Part XI apply? If "Yes," complete and attach Part XI X 11 11 Reserved for future use 12 12

For IRS Use Only

For Paperwork Reduction Act Notice, see the Instructions for Form 1065. www.irs.gov/Form1065

Does Part XIII apply? If "Yes," complete and attach Part XIII

Schedule K-3 (Form 1065) 2022

13

X

Filed 08/28/23

Doc 90-4

Case 23-23313

Entered 08/28/23 10:42:14

Desc Exhibit

Schedi Name HO Par	Partner# 7 Schedule K-3 (Form 1065) 2022 Name of partnership Holiday Ham Holdings, LLC Part II Foreign Tax Credit Limitation (continued)	.C (continued)	EIN	Mike Wh	Wharton		Ø M	Page 4	
Sec	Section 1—Gross Income (continued)			Foreign 9	Source				s e 2
	Description	(a) U.S. source	(b) Foreign branch category income	(c) Passive category income	(d) General category income	(e) Other (category code)	(f) Sourced by partner	(g) Total	3-23
16	1 1								313
12	Section 987 gain								}
19	1 -								Doc
. – •	- A								90-4
7 20	Other income (see instructions) A us	25,724						25,724	Fil 20
_ •	8 U								
27	21 Reserved for future use A			Ċ	1100)8/28 Part 4
_ •	a c								/23 4
22	Reserved for future use								En Page
. —	8								tere 13
3 6	C Basenad for future use								ed (3 of
S.									08/28 27
	10								3/2
24	Total gross income (combine lines 1 through 23)	438,732						438,732	3 10
	A US	438,732						438,732	:42:
	ى 2								14
							Schedule K	Schedule K-3 (Form 1065) 2022	Desc Exh
									ibit

Schedule K-3 (Form 1065) 2022 Name of partnership		E	Name of partner			00	SSN or TIN	
Holiday Ham Holdings, LLC	် နို		Mike Wh	Wharton				С
Part II Foreign Tax Credit Limitation (continued)	(continued)							as
Section 2—Deductions			Foreign	Source				e 2
Description	(a) U.S. source	(b) Foreign branch		(d) General	(e) Other	(f) Sourced by	(g) Total	:3-2
25 Expenses allocable to sales income	539 266	category income	category income	category income	(category code		230 266	331
							002,600	L3
from performances of services								
27 Net short-term capital loss								Dо
28 Net long-term capital loss								c S
29 Collectibles loss								90-
30 Net section 1231 loss								-4
31 Other losses Strnt	348						348	
32 Research & experimental (R&E) expenses								File 20
A SIC code								
B SIC code								
C SIC code								
33 Allocable rental expenses—								
		2						
34 Allocable rental expenses—other than								
		And the second section of the second						
~								
expenses—depreciation, depletion,								
- 1								
						-2		08 f 2
expenses—other than depreciation,								
- 1								28/
37 Depreciation not included on line 33								23
	23,012						23,012	3 1
- 1	249						249	0:4
39 Interest expense specifically allocable							*****	42
- 1								:14
40 Other interest expense specifically								4
allocable under Regulations section	10-1 mm months							
- 1	11,731						11,731	Эе
- 1								sc
42 Other interest expense—investment								; E
43 Other interest expense—passive activity								xh
44 Section 59(e)(2) expenditures,								nib
excluding R&E expenses on line 32								it
45 Foreign taxes not creditable but								
deductible								
DAA						Schedule K	Schedule K-3 (Form 1065) 2022	

23-23313		2022	909,	874												
											28/62	2A(ii)	2A(iii)		2B(i)	2B(ii)
						zategory code 901j)										***************************************
General ory income					General	e e										
Foreign (c) Passive category income					eign	category income					Enter the following.					
(b) Foreign branch category income				or 1118	(b) Foreign branch	category income								States		
(a) U.S. source			574,606	-135,874 tion of Form 1116 it Factors	(a) U.S. source						R&E expenses enterned in the United State			ned outside the United		
Description 46 Section 986(c) loss 47 Section 987 loss	ction 988 loss her allocable deductions (see fructions) her apportioned share of ductions (see instructions)	served for future use served for future use	ough 53) t income (loss) (subtract line 54	m line 24) Other Information for Preparat 1—R&E Expenses Apportionmen	Description	oss receipts by SIC code	Code	code	2 code	3 code	clusive apportionment with respect to total Expense with respect to activity perform SIC onde	SIC code	iii) SIC code	E expense with respect to activity perform	SIC code	(ii) SIC code
	(a) U.S. source (b) Foreign branch (c) Passive (d) General (e) Other category income category income (category income category	(f) Sourced by category income	(a) U.S. source (b) Foreign branch (c) Passive category income	(a) U.S. source (b) Foreign branch category income (c) Passive category income (d) General category income (e) Other partner (g) Total 5574,606 574,606	Source (b) Foreign branch (c) Passive (d) General (e) Other partner category income category i	Source (b) Foreign branch (c) Passive (d) General (allegory code 9011) category income catego	Decign branch (c) Passive (d) General (e) Other partner (alegory income category income (alegory oxee 9011) Partner Category income cate	(d) U.S. source (a) Foreign branch (c) Passive (d) General (e) Other category income (a) Category income (a) Other (a) Other (b) Other (b) Total (c) Total (d) Category income (a) Other (a) U.S. source (a) Other (a) U.S. source (a) Other	Source (a) Foreign branch (c) Passive (d) General (e) Other (f) Sourced by (g) Total (g) Total (g) Category income (category	Source (b) Foreign branch (c) Passive (d) General (e) Other (e) Other (alegory income category income category income (alegory income category income category income (c) Passive (d) General (e) Other (f) Passive (d) General (e) Other (d) Sourced by (f) Sourced	Provigin branch (a) Passive (b) Ceneral (c) Cenera	Source D) Foreign branch (c) Passive (d) General (e) Other (allegory income category income category income category income (allegory income category income category income (allegory income category income category income (e) Other (e) Ot	Category income Category i	Source (b) Foreign branch (c) Passive (d) General (e) Other (e) Partner (d) Category income (allegory income (allegory income (d) Category income (allegory income (d) Category income (d) Category income (e) Other (e) Passive (d) Category income (e) Other (e) Passive (e) Other (allegory income (e) Category income (e) Other (c) Passive (e) Other (c) Passive (e) Other (c) Passive (e) Other (allegory income (e) Other	Source (b) Foreign branch (c) Passive (d) General (e) Other (all partner category income categ	Source Di Foneign branch (c) Passive (d) General (e) Other (e) Other

Continued Cont			EN	Name of partner	partner		S	SSN or TIN
Furthers Expense Approximent Factors	g	C		Mike Mike	Wharton			0.71-810-7587
Foreign Source Category income Country code	-2	ent Factors	01 11 10 (COUNTY	nea)				
roome category income (category code (category category cate				Fo	reign Source			
Foreign Source	Description	(a) U.S. source	(b) Foreign bran category incom	(category is		(catego	(f) Sourced by partner	(g) Total
Foreign Source		281,410						281,410
Foreign Source								-1
Foreign Source	1	And the second s						
Foreign Source	interest expense under Regulations					1. 32 150 ₁ 07 2. 10.		
Foreign Source								
Foreign Source						Was to be the same		
Foreign Source								
Foreign Source					8			
Country code Coun								
Foreign Source	(subtract the sum of lines 3, 4, and 5	100	り言	リ				
Foreign Source (c) General (ad) Other (ategory code (country code (coun		Z81,410						281,410
Foreign Source (c) General (al) Other partner category income (country code)						· 2		
Foreign Source (c) General (a) Other (e) Sourced by category income (country code)								
Foreign Source (c) General (al Other category income (country code)								
Foreign Source (c) General (ategory code) partner (country code)								
Foreign Source (c) General (category code) partner (country code)								
Foreign Source (c) General (a) Other (astegory code (country code (coun					Li de Circo			
Foreign Source (c) General (a) Other (e) Sourced by category income (country code)	(see attachment)				-			
Foreign Source (category income (country code)								
Secription (a) U.S. source (b) Passive (c) General (d) Other (e) Sourced by partner bss receipts category income ons allocable to foreign-pits category income (country code on partner) partner	lion 3—Foreign-Derived Intangible Inc	ome (FDII) Dedu	ction Apportion	ment Factors				
sscription (a) U.S. source (b) Passive (c) General (d) Other (e) Sourced by category income category income (category code) partner nos allocable to foreign-phs ons allocable to foreign-phs (country code) phs (country code) phs (country code)				House and a second seco	Foreign Source	- Andrewson and the second		
ons allocable to foreign- pts	Description	(a) U.S	····	(b) Passive legory income	(c) General category income	(category code)	(e) Sourced by partner	(f) Total
ons allocable pts	1					(coming code		
Partnership deductions allocable to foreign-derived gross receipts								
derived gross receipts	Partnership deductions allocable to foreign-							
Other partnership deductions apportioned to	derived gross receipts							***************************************
	Other partnership deductions apportioned to	_						

Partner# 7

	3 Entered 08/28/23 10:42:14 Desc Exhibit
2022 Part 4	Page 19 of 27
Partner# 8	Final K-3 Amended K-3
	of Income, Deductions, OMB No. 1545-0123
(Form 1065) Credits, et	c.—International
Department of the Treasury Internal Revenue Service For calendar year 2022, or tax year beginning _ See se	12/27/2021, ending 12/25/2022 2022
Internal Revenue Service See se	parate instructions.
A Partne ship's employer identification number (EIN)	Information About the Partner
A Fartier up semployer identification flumber (EIN)	C Partner's SSN or Taxpayer Identification Number (TIN) (Do not use TIN of a
47-5623295	disregarded entity. See instructions.)
B Partnership's name, address, city, state, and ZIP code	D Name, address, city, state, and ZIP code for partner entered in C. See instructions.
and the state of t	Robert J Hussey III
Holiday Ham Holdings, LLC	
7700 Poplar Ave, Suite 200	227 West Chickasaw Pkwy
Germantown TN 38138	Memphis TN 38111
E Check to indicate the parts of Schedule K-3 that apply.	
	Yes No
1 Does Part I apply? If "Yes," complete and attach Part I	1 X
2 Does Part II apply? If "Yes," complete and attach Part II	2 X
3 Does Part III apply? If "Yes," complete and attach Part III	3 X
4 Does Part IV apply? If "Yes," complete and attach Part IV	4 X
	5 X
6 Does Part VI apply? If "Yes," complete and attach Part VI	6 X
7 Does Part VII apply? If "Yes," complete and attach Part VII	7 X
8 Does Part VIII apply? If "Yes," complete and attach Part VIII	8 X
9 Does Part IX apply? If "Yes," complete and attach Part IX	9 X
10 Does Part X apply? If "Yes," complete and attach Part X	10 X
11 Does Part XI apply? If "Yes," complete and attach Part XI	11 X
12 Reserved for future use 13 Does Part XIII apply? If "Yes." complete and attach Part XIII	12
13 Does Part XIII apply? If "Yes," complete and attach Part XIII	13 X
Q Q	100
98	
n s	
For IRS Use Only	
Д	
•	
For Paperwork Reduction Act Notice, see the Instructions for Form 1065. www	v.irs.gov/Form1065 Schedule K-3 (Form 1065) 2022

Page 20 of 27 2022 Part 4 Page 2 187,626 Schedule K-3 (Form 1065) 2022 1,394 (g) Total (attach description and statement) SSN or TIN 12. Form 8865 information13. Other international items 11. Dual consolidated loss 2 (f) Sourced partner 1.672 (e) Other (category code 8. Form 5471 information9. Other forms10. Partner loan transactions III category income Hussey (d) General Foreign Source ט Name of partner Robert (c) Passive category income Partner's Share of Partnership's Other Current Year International Information (b) Foreign branch category income Section 267A disallowed deduction Form 8858 information EN 5. High-taxed income 10000 394 187,626 (a) U.S. source Check box(es) for additional specified attachments. See instructions. H 6. Foreign Tax Credit Limitation LIC Gross income from performance of servides Ordinary dividends (exclude amount Holiday Ham Holdings, Gross rental real estate income Other gross rental income Description Foreign oil and gas taxes Section 1—Gross Income Guaranteed payments 4. Foreign tax translation 1. Gain on personal property sale Splitter arrangements Schedule K-3 (Form 1065) 2022 Interest income on line 8) Name of partnership Partner# Sales DS OS Part I Part II 2i ε; - · · A B O **∞** ∢ œ ပ Ø B O K m U C 7 က 4 Ŋ 9

Filed 08/28/23

Doc 90-4

Case 23-23313

Entered 08/28/23 10:42:14

Desc Exhibit

Filed 08/28/23 2022 Part 4 I

Doc 90-4

Case 23-23313

(g) Total

Page 3

Partner# 8

Holiday Ham Holdings, LLC Part II Foreign Tax Credit Limitation (continued) Section 2—Deductions Description Descript	(b) Foreign branch category income	Foreign (c) Passive category income	Source (d) General category income	III			Ca
(a) U.S. source (a) u.S. source (a) u.S. source (b) u.S. source (b) u.S. source (c) u.S. s			Source (d) General category income	The state of the s			1
(a) U.S. source [246,803]		ug IIIIIIIIIIIIIIIIIIIIIIIIIIIIIIIIIIII	Source (d) General category income			The second secon	ise
(a) U.S. source (246, 803 159		(c) Passive category income	(d) General category income				23
246,803				(e) Other (category code	(i) sourced by partner	(g) Total	3-23
						246,803	31,
							3
				- 49			L
							סכ
							C S
							90
							-4
mental (R&E) expenses						150	**
						1	
							le 02

u ₀							
Allocable rental expenses—other than							
depreciation, depletion, and amortization							
Allocable royalty and licensing	7837						
-depreciation, depletion,						A	
Allocable royalty and licensing							0 of 2
expenses—other than depreciation,		- Linux					
depletion, and amortization							
Depreciation not included on line 33							12.
10,						10,532	3]
Charitable contributions						114	LU
Interest expense specifically allocable							42
under Regulations section 1.861-10(e)							2:1
Other interest expense specifically							-4
allocable under Regulations section							
5,369						5.369	De
Other interest expense—business						-1	eso
Other interest expense—investment							CE
Other interest expense—passive activity							:XI
Section 59(e)(2) expenditures,							1IK
excluding R&E expenses on line 32							JIC
Foreign taxes not creditable but							

Page 6				, d	€ —											262,977		-62,184	Paq		(f) Sourced by partner (g) Total									2A(i)	2A(ii)	2A(iii)		2B(i)	20/ii/
	III				(e) Other (category code 901 j	And Andrews															(e) Other (category code 901j														
	J Hussey I	1 1		Source	(d) General category income	The second secon		THE THE PERSON NAMED IN COLUMN TWO IS NOT THE PERSON NAMED IN COLUMN TO THE PERSON NAMED IN COLU								Apple of the second sec				Source	(d) General category income														
Name of partner	Robert			Foreign	(c) Passive category income															Foreign	(c) Passive category income							32. Enter the following.	i i						
Z					(b) Foreign branch category income											9					(b) Foreign branch category income					28		10					States		
	υ	(continued)			(a) U.S. source											262,977		-62,184	t Factors		(a) U.S. source							R&E expenses entere	ned in the United States				ned outside the United		
Schedule K-3 (Form 1065) 2022 Name of partnership	Holiday Ham Holdings, LLC	nita	Section 2—Deductions (continued)		Description	46 Section 986(c) loss	47 Section 987 loss	48 Section 988 loss	49 Other allocable deductions (see	- 1	50 Other apportioned share of	- 1	52 Reserved for future use	- 1	54 Total deductions (combine lines 25	through 53)	55 Net income (loss) (subtract line 54	from line 24)	Section 1—R&E Expenses Apportionment Factors		Description	1 Gross receipts by SIC code		C SIC code	D SIC code	E SIC code	F SIC code	2 Exclusive apportionment with respect to total R&E expenses entered on Part II, lin	A R&E expense with respect to activity performed in the United States	(i) SIC code	4	(iii) SIC code	B R&E expense with respect to activity performed outside the United States		(ii) SIC code

Section 2—Interest Expense Apportionment Factors Description Description Total average value of assets adjustment to assets—average value adjustment to assets—average value interest expense under Regulations Section 1.861-10(e)	116 or 1118 (cor	1295	Robert J Hussey	ey III		
Description Total average value of assets		ntinued)				
able ations			Foreign Source			
e value able ations	e (b) Foreign branch category income	ranch (c) Passive	sive (d) General ncome category income	ral (e) Other come (country code	(f) Sourced by partner	(g) Total
Sections 734(b) and 743(b) adjustment to assets—average value Assets attracting directly allocable interest expense under Regulations section 1.861-10(e)	92					128.792
Assets attracting directly allocable interest expense under Regulations section 1.861-10(e)						
interest expense under Regulations section 1.861-10(e)						
						A landing to
Other assets attracting directly						
allocable interest expense under	******				S	
Regulations section 1.861-10T						
Assets excluded from apportionment						
formula						
Total assets used for apportionment						
and 5						
128,	792	Management of the state of the				128,792
Assets attracting business interest						
expense						
Assets attracting investment interest						
Assate attraction possive activity						
interest expense					9-16-16-16-16-16-16-16-16-16-16-16-16-16-	
Basis in stock of 10%-owned						
noncontrolled foreign corporations	nav suces					
(see attachment)					81.	
Basis in stock of CFCs (see attachment)						
Section 3-Foreign-Derived Intangible Income (FDII) Deduction Apportionment Factors	duction Apporti	ionment Factors				
			Foreign Source			
Description (a) ∪	(a) U.S. source	(b) Passive	(c) General	(d) Other	(e) Sourced by partner	(f) Total
		category income	category income	(country code	5	
Foreign-derived gross receipts						
Cost of goods sold						
Partnership deductions allocable to foreign-						
derived gross receipts						
Other partnership deductions apportioned to						

Partner# 8